Exhibit C

Orr, Jason A.

From: Orr, Jason A.

Sent: Thursday, September 30, 2021 6:14 AM

To: 'Manny Starr'; Pao, William K.; Lazatin, Carlos M.

Cc: Chris Marlborough; Ari Basser; Karo Karapetyan; Mary Mars

Subject: RE: Bitmain - supplemental brief deadline

Understood, Manny. To be clear, we don't agree that the briefs are due Monday. We believe they're due tomorrow, as you originally proposed and we previously agreed, because that is the last court day that is also within 30 days of the deposition. However, if you insist on filing after this Friday, then that leaves us with no choice but to file on Monday, which is the next possible date to file under FRCP 6.

Thanks,

O'Melveny

Jason Orr

jorr@omm.com O: +1-213-430-6136

From: Manny Starr <manny@frontierlawcenter.com>

Sent: Wednesday, September 29, 2021 4:21 PM

To: Orr, Jason A. <jorr@omm.com>; Pao, William K. <wpao@omm.com>; Lazatin, Carlos M. <clazatin@omm.com> **Cc:** Chris Marlborough <Chris@marlboroughlawfirm.com>; Ari Basser <abasser@pomlaw.com>; Karo Karapetyan

<karo@frontierlawcenter.com>; Mary Mars <mary@frontierlawcenter.com>

Subject: Re: Bitmain - supplemental brief deadline

[EXTERNAL MESSAGE]

Hi Jason,

If we are using FRCP 6 to help determine the deadline, then the most reasonable interpretation is that the briefs are due Monday. We would agree that both parties should file the briefs simultaneously <u>on Monday</u>, <u>October 4th</u>.

Thanks

Manny Starr

Managing Partner

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From: Orr, Jason A. < jorr@omm.com>

Sent: Wednesday, September 29, 2021 2:33 PM

To: Manny Starr < <u>manny@frontierlawcenter.com</u>>; Pao, William K. < <u>wpao@omm.com</u>>; Lazatin, Carlos M.

<clazatin@omm.com>

Cc: Chris Marlborough <chris@marlboroughlawfirm.com>; Ari Basser <abasser@pomlaw.com>; Karo Karapetyan

karo@frontierlawcenter.com; Mary Mars mary@frontierlawcenter.com;

Subject: RE: Bitmain - supplemental brief deadline

Thanks, Manny. As I said before, we're prepared to file on Friday. If Plaintiff needs more time, we suggest that the parties both file on Monday, October 4. Under FRCP 6, court deadlines do not fall on weekends or court holidays. A Sunday filing presents unnecessary burdens to our staff, who would be made to work outside normal work hours. Please confirm when Plaintiff intends to file his brief.

O'Melveny

Jason Orr

jorr@omm.com O: +1-213-430-6136

From: Manny Starr < manny@frontierlawcenter.com>

Sent: Tuesday, September 28, 2021 9:05 PM

To: Orr, Jason A. <<u>jorr@omm.com</u>>; Pao, William K. <<u>wpao@omm.com</u>>; Lazatin, Carlos M. <<u>clazatin@omm.com</u>> **Cc:** Chris Marlborough <<u>chris@marlboroughlawfirm.com</u>>; Ari Basser <<u>abasser@pomlaw.com</u>>; Karo Karapetyan

<karo@frontierlawcenter.com>; Mary Mars <mary@frontierlawcenter.com>

Subject: Re: Bitmain - supplemental brief deadline

[EXTERNAL MESSAGE]

Hi Jason,

Although we discussed filing the briefs simultaneously on October 1st, we didn't take into account that the deposition crossed over midnight on September 2nd and ended the morning of September 3rd, and we didn't

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consider whether it is necessary to file the brief on a Court day. After discussing internally, we believe the briefs can be filed on October 3rd, which is within the 30-day period ordered by the Court. In any event, if you agree, that would provide both parties additional time, which would plainly benefit both sides, and be consistent with the Court's Order.

Unless you can point to some law or local rule that requires the Parties to file the briefs on a Court day, we plan to file prior to midnight <u>on October 3rd</u>, and would like your agreement to do the same.

We are happy to field a call if you think a discussion would be beneficial.

As to your point regarding the confidential material, we will inform you prior to our filing which documents and/or information we plan to use in our brief.

Thanks

Manny Starr

Managing Partner

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From: Orr, Jason A. <jorr@omm.com>

Sent: Tuesday, September 28, 2021 2:10 PM

To: Manny Starr <manny@frontierlawcenter.com>; Pao, William K. <wpao@omm.com>; Lazatin, Carlos M.

<clazatin@omm.com>

Cc: Chris Marlborough <<u>chris@marlboroughlawfirm.com</u>>; Ari Basser <<u>abasser@pomlaw.com</u>>; Karo Karapetyan

< karo@frontierlawcenter.com >; Mary Mars < mary@frontierlawcenter.com >

Subject: RE: Bitmain - supplemental brief deadline

Hi Manny,

When you messaged us on September 10, you said it was "our understanding that the deadline to file simultaneous briefs is Friday, October 1st." On our call the following week, we agreed that October 1 was an appropriate deadline because the Court's order requires briefing "within 30 days after the date that Plaintiff takes the aforementioned deposition(s)." Please confirm that you will file your brief on Friday, as we intend to.

Relatedly, are you planning on attaching or quoting any confidential materials produced during discovery in connection with your brief? If so, please let us know immediately which documents or deposition transcript excerpts you intend to file so that we can determine whether those documents should be sealed in the court record.

Thanks,

O'Melveny

Jason Orr

jorr@omm.com O: +1-213-430-6136

From: Manny Starr < manny@frontierlawcenter.com>

Sent: Tuesday, September 28, 2021 9:14 AM

To: Pao, William K. <<u>wpao@omm.com</u>>; Orr, Jason A. <<u>jorr@omm.com</u>>; Lazatin, Carlos M. <<u>clazatin@omm.com</u>> **Cc:** Chris Marlborough <<u>chris@marlboroughlawfirm.com</u>>; Ari Basser <<u>abasser@pomlaw.com</u>>; Karo Karapetyan

< karo@frontierlawcenter.com >; Mary Mars < mary@frontierlawcenter.com >

Subject: Bitmain - supplemental brief deadline

[EXTERNAL MESSAGE]

Counsel,

As you are aware, the Court has instructed the parties to move forward with filing the supplemental briefing as scheduled. We are conferring with you to identify a mutually agreeable date by which both parties will commit to filing the supplemental briefing. We had originally discussed simultaneously filing the supplemental briefing on Friday, October 1st. However, given that the deposition giving rise to the 30 day deadline ended in the early morning hours of September 3rd, the 30 day mark falls on Sunday, October 3rd. Further, we do not believe it is necessary to move the briefing deadline to a business day.

With that said, Plaintiff understands the supplemental briefing to be <u>due on Sunday, October 3rd</u>, and intends to file the brief on this date. Please confirm your agreement that the supplemental briefing should be simultaneously filed <u>on October 3rd</u>.

Thanks

Manny Starr

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